

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

IN RE:	)	
	)	<b>Case No. 3:22-cv-00474</b>
CUMMINGS MANOOKIAN, PLLC,	)	
	)	<b>Judge Aleta A. Trauger</b>
Debtor.	)	
	)	

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**APPELLANTS MANOOKIAN PLLC AND BRIAN MANOOKIAN’S STATEMENT OF  
THE ISSUES TO BE PRESENTED AND DESIGNATION OF ITEMS TO BE  
INCLUDED IN APPELLATE RECORD**

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Pursuant to **Federal Rule of Bankruptcy Procedure 8009**, Appellants Manookian PLLC and Brian Manookian (“Appellants”) hereby files this Statement of the Issues to be Presented and Designation of Items to be Included in Appellate Record.

**Issues To Be Presented**

Whether the Bankruptcy Court erred in failing to recuse itself, scheduling an evidentiary hearing, and *sua sponte* quashing a subpoena after engaging in material *ex parte* communications about Appellants, details of which it has not disclosed to the parties.

**Designation of Items To Be Included in Appellate Record**

The appellate record consists of the following:

- All docket entries in the bankruptcy proceeding (No. 3:19-bk-07235) and related adversary proceeding (No. 3:20-ap-90002), specifically including adversary proceeding docket entries 161, 165, 173, 174, 177, and 178, and all attachments thereto.
- Transcript (forthcoming) of June 29, 2022 adversary proceeding hearing on motion to disqualify.

Date: June 29, 2022

Respectfully submitted,

/s/ John Spragens

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Statement of the Issues to be Presented and Designation of Items to be Included in Appellate Record was filed June 29, 2022, and served electronically upon the following parties in interest as indicated on the receipt issued by the Court's electronic filing system:

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